

# **Exhibit A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWSVILLE DIVISION**

STATE OF TEXAS, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 1:18-CV-68
	)	
UNITED STATES OF AMERICA, <i>et at.</i> ,	)	
	)	
Defendants,	)	
	)	
and	)	
	)	
KARLA PEREZ, <i>et al.</i> ,	)	
	)	
Defendant-Intervenors,	)	
	)	
and	)	
	)	
STATE OF NEW JERSEY,	)	
	)	
Defendant-Intervenor.	)	

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**FEDERAL DEFENDANTS' RESPONSES TO  
DEFENDANT-INTERVENORS' REVISED DISCOVERY REQUEST**

TO: Defendant-Intervenors, by and through their attorneys of record, Nina Perales, Celina Moreno, Jack Salmon, Alejandra Avila, Mexican American Legal Defense and Educational Fund, 110 Broadway, Suite 300, San Antonio, Texas 78205; Carlos Moctezuma García, García & García, Attorneys at Law P.L.L.C., P.O. Box 4545 McAllen, Texas 78502.

Federal Defendants serve this response to Defendant-Intervenors' revised interrogatory pursuant to the Federal Rules of Civil Procedure. Federal Defendants respond to this interrogatory pursuant to the Court's June 26, 2019 Order, ECF Dkt. 412, requiring that Federal Defendants respond to Defendants-Intervenors' Interrogatory No. 13 – notwithstanding Federal Defendants' objections, and the Court's August 2, 2019 Order, ECF Dkt. 421, granting the parties' joint motion to modify the interrogatory to which Federal Defendants were ordered to respond, by reviewing a random sampling of 500 responsive records.

**RESPONSE TO DEFENDANT-INTERVENORS' REVISED INTERROGATORY**

**REVISED INTERROGATORY**

Please identify the total number of requestors approved for DACA between June 2012 and June 2018:

- With an approved Form I-485 (Application to Register Permanent Residence or Adjust Status), based on 8 U.S.C. § 1255(a), and
- Who received a Class of Admission code (COA) following approval of the Form I-485 indicating they adjusted to Lawful Permanent Resident (LPR) status as an immediate relative (*i.e.*, qualified spouse, child or parent of a United States citizen), and
- With an approved Form I-131 application for an advance parole document based on the standards associated with the DACA policy where the Form I-131 was approved before the Form I-485 filing date; and
- Who was paroled into the United States by U.S. Customs and Border Protection on the basis of the DACA-based advance parole document (Form I-512L) that was issued to the DACA recipient and where such parole occurred before the Form I-485 was filed; and
- Where the DACA recipient/adjustment applicant could not have met the requirement in 8 U.S.C. § 1255(a) to have been “inspected and admitted, or paroled” but for his or her entry to the United States on the DACA-based advance parole document.

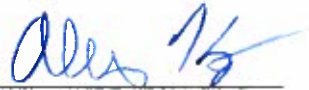
**RESPONSE**

Federal Defendants respond that 484 individuals, out of the random sampling of 500, met all the criteria in the Interrogatory. Based on a total population of 14,600 requestors that met the first three criteria of the interrogatory before sampling, USCIS estimates with a +/- 1.5% margin of error, that between 13,908 and 14,358 requestors approved for DACA between June 2012 and June 2018 meet all the criteria as specified in this revised interrogatory above.

**VERIFICATION OF RESPONSE TO REVISED INTERROGATORY**

I, Alexander King, Senior Advisor, U.S. Citizenship and Immigration Services' (USCIS) Service Center Operations (SCOPS), certify that, based on my knowledge, information made available to me in the course of my official duties, and belief, the foregoing response is true and correct regarding the manual review of the records related to the five hundred (500) individuals selected for the random sample provided to SCOPS and the conclusion that four hundred eighty-four (484) individuals in the sample met all of the terms of the revised interrogatory approved by the Court on August 2, 2019.

DATED: October 10, 2019.




Alexander King  
Senior Advisor, SCOPS, USCIS

**VERIFICATION OF RESPONSE TO REVISED INTERROGATORY**

I, Mike Hoefer, Chief of U.S. Citizenship and Immigration Services' (USCIS) Office of Performance and Quality (OPQ), certify that, based on my knowledge, information made available to me in the course of my official duties, and belief, the foregoing is true and correct regarding: 1) the total population of requestors that met the first three criteria of the interrogatory before sampling and 2) within the stated margin of error, the estimated number of requestors approved for DACA between June 2012 and June 2018 that met the all criteria as specified in the interrogatory.

DATED: October 10, 2019.

  
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Michael Hoefer  
Chief, OPQ, USCIS

Dated: October 14, 2019

Respectfully submitted,

JOSEPH H. HUNT

Assistant Attorney General

Civil Division

WILLIAM C. PEACHEY

Director, Office of Immigration Litigation

District Court Section

/s/ Jeffrey S. Robins

JEFFREY S. ROBINS

Attorney-in-Charge

Deputy Director

U.S. Department of Justice, Civil Division

Office of Immigration Litigation

District Court Section

P.O. Box 868, Washington, DC 20044

Telephone: (202) 616-1246

Facsimile: (202) 305-7000

jeffrey.robins@usdoj.gov

*Attorneys for Federal Defendants*